

# CCP EnviroNews

October 2002

## Environmental News from the CCP - Saukville Facility

### Welcome to the Third Edition of CCP EnviroNews

Twice a year, CCP publishes *EnviroNews* to share information with our neighbors and the Saukville community about new developments relating to CCP's environmental programs and performance. In this issue, you can read about:

- Results of CCP's 2002 community survey
- The status of groundwater cleanup
- What is an EMS and why is CCP doing one
- What's burning in the CCP incinerator

### 2002 Community Survey Results

CCP recently completed its second Saukville community survey; the first was undertaken two years ago. The survey was designed to help the company respond to community concerns and identify trends relating to CCP environmental performance and programs. The 2002 survey contained a mix of both repeat questions from the 2000 survey and new questions relating to CCP outreach efforts over the last two years. It was mailed to 201 individuals, businesses and organizations, mostly in the Saukville area. Fifty completed surveys were received, for a 25% return rate. Here are the key results.

- 54% think that "CCP is a good environmental citizen," 32% think "CCP's environmental performance is OK but it could improve," 6% chose the statement "CCP has a poor environmental record" and 2% think that "pollution from CCP is a major threat to public health and the environment."

- 84% indicated that the CCP Saukville facility is being run cleaner, 6% indicated that the facility is being run less clean and 2% indicated that it's being run about the same as before CCP owned it.
- 32% don't notice any odors coming from the plant, 52% can detect a slight odor, 8% think odors are common, 8% think that odors are both common and annoying and none indicated that odors are either constant or constant and overpowering
- 56% percent said they know who to call about an odor or other problem at CCP. 28% have contacted CCP about an odor or other problem. Of these, 80% said that CCP's response to complaints has improved over the last several years.
- Most people are still very much concerned about potential hazards at the CCP facility (chemical spills, air pollution, water pollution, hazardous waste, explosions, fire), even though they are generally comfortable with how CCP is addressing them.
- The most popular information sharing technique that people would like to see CCP use is a newsletter, followed by publicizing CCP's phone number, receiving summaries of advisory committee meetings and an annual public meeting.
- 40% reported receiving the CCP newsletter, 30% indicated that they had not received it and 26% couldn't remember. All those who received the newsletter read it and 95% indicated that the information was useful.

- 24% were aware of the CCP information depository at the Saukville Library and only one person reported actually using the repository.
- 54% knew about the CCP Community Advisory Committee. Among those who knew about the committee, 63% reported knowing someone on the committee.
- 70% think CCP is doing everything possible to protect the health and well-being of Saukville residents and 18% do not.

Similar to the 2000 survey, in 2002 those who have lived in the Saukville area a shorter time (12 years or less) think that CCP's environmental performance, in general, is better than those who have lived here a longer time; the general impression of CCP by those who live a block or less from the CCP facility is not as favorable as those who live in the general neighborhood or further away; and people who know CCP employees tend to rate CCP's performance better than those who don't know any employees.

If you would like a copy of the report summarizing the survey results, call Glenn Preisler (268-3395).

**CCP ODOR HOTLINE**  
**During business hours--284-0555**  
**After hours--268-3399**

### **Groundwater Cleanup**

Although reaction water, a waste product of the chemical manufacturing process at CCP, has been burned in our incinerator since 1980, this wasn't always the case. Starting in 1952, Freeman Chemical Company started eliminating reaction water by land disposal on the grounds of the facility. This resulted in groundwater contamination at several places on the facility site and the adjacent church yard and ball field.

In 1985, a long, complicated process mandated by the U.S. Environmental Protection Agency and Wisconsin Department of Natural Resources (DNR) was started to investigate the contamination and clean it up. Two years later, Freeman Chemical was required to initiate a groundwater monitoring, pumping and treatment project. When CCP purchased the facility in 1990, it also inherited this groundwater cleanup effort.

The bad news was that several toxic chemicals were found in the groundwater--benzene, toluene, ethylbenzene, xylene, trichloroethylene, dichloroethylene and vinyl chloride. The good news is that monitoring during the last five years has shown that the groundwater plume containing these chemicals has been contained on site, pollutant levels have decreased and there have been no impacts on city wells.

CCP is submitting a proposal to the DNR to evaluate some new groundwater treatment technologies, including in-place bioremediation, that have been developed since the groundwater cleanup at the Saukville facility began 15 years ago. Whether the current pumping and treatment program continues or a new treatment technology is eventually employed, the cleanup goals for the site remain the same:

Short term goals—

- Demonstrate no unacceptable human exposure
- Demonstrate that the plume is not increasing

Final Cleanup Goals—

- Return the groundwater to its maximum beneficial use
- Control or eliminate surface and underground sources of contamination

### **What Is an EMS and Why Is CCP Doing One?**

The easiest way to describe an environmental management system (EMS) is a systematic approach to planning, controlling, measuring, and improving environmental performance. It takes a lot of work to set up an EMS, however once it is in place and working, companies should become more efficient, more environmentally friendly, and more profitable.

Ideally, an EMS will help CCP make the right products the right way, prevent accidental releases, pollution and waste, and help ensure compliance with applicable environmental regulations. An EMS is a fresh and more organized approach to achieving an efficient and effective environmental program for a company.

The essential elements of an EMS are described below:

**Environmental Policy** - Statement of the company's commitment to environmental improvement, pollution prevention and compliance with regulations which becomes the framework for planning and action.

**Environmental Aspects** – An inventory of the environmental attributes of the company's products, activities and services, along with an evaluation and ranking of their impacts.

**Legal and Other Requirements** – Identification of all relevant environmental, health and safety laws and regulations that apply to the facility and how they inter-relate.

**Objectives and Targets** - Environmental goals for the company which are based on the environmental policy, environmental impacts and input from interested parties, employees and managers.

**Environmental Management Program** - Plan actions to achieve objectives and targets.

**Structure and Responsibility** - Establish roles and responsibilities and provide resources.

**Training** - Ensuring that employees are capable of carrying out their environmental responsibilities and the company's objectives and targets.

**Communication** – Establishing processes for internal and external communications on environmental management issues.

**EMS Documentation and Control**- Maintaining records, documents and effective procedures relating to the EMS and related documents.

**Emergency Preparedness and Response** – Identification of potential emergencies and procedures for preventing and responding to them.

**Monitoring and Measurement** - Tracking key activities and environmental performance in order to allow for “fine tuning” of the EMS.

**Management Review** - Periodic review of the EMS and any changes necessary to achieve continuous environmental improvement over time.

So, why is CCP developing an EMS? CCP anticipates a variety of benefits to the company from an effective environmental management system, including:

- Improved environmental performance
- Reduced environmental risk and liability
- Proactive, rather than reactive, environmental management
- Business efficiency and competitive advantage
- Enhanced employee involvement
- Enhanced consumer and community confidence
- Reduced costs (consultant fees, legal costs and manpower)

We have started developing an EMS at the CCP – Saukville plant, and will use its Community Advisory Committee (CAC) which includes employees, plant neighbors, and local and state authorities, and academic representatives to provide their perspective to this process.

### **Incinerator Transition**

As part of our Cooperative Environmental Agreement with the DNR, CCP is no longer burning hazardous waste in the incinerator. In the past CCP put all of its wastes into a complex chemical mix that could only be managed by incineration. Now, CCP is identifying individual waste streams and their sources, and evaluating ways to reduce, reclaim, or recycle them. Because there has been some confusion as to what is or isn't being burned, here is a brief before and after comparison of how the incinerator is operated by CCP and regulated by DNR.

### Materials Being Burned

**Before**—The waste “reaction water” that was burned was considered a hazardous waste because it was easily ignitable and sometimes corrosive.

**Now**—Reaction water is still burned in the incinerator but first it is treated to (1) remove the xylene and other solvents that made it ignitable and (2) neutralize it so it is less corrosive, so that it is no longer a hazardous waste.

### Fuels Used

**Before**—Spent process and rinse (cleaning) solvents from the plant were used as fuel along with natural gas.

**Now**—Only natural gas is used for fuel. All solvent is sent off site for reclamation or fuel blending. The reclaimed solvent is then reused as a rinse solvent at the plant.

### Operating Requirements

**Before**—Temperature and operational requirements for a hazardous waste incinerator were met.

**Now**— CCP has committed to continue to operate the incinerator at the temperatures and operating conditions used when it was a licensed hazardous waste incinerator even though the wastes being burned are no longer considered hazardous.

### DNR Regulation

**Before**—The CCP incinerator was regulated as a hazardous waste incinerator by the DNR Air Management program.

**Now**— The nonhazardous waste incinerator is regulated by both the DNR Air Management Program and DNR Wastewater Pretreatment Program. Each batch of reaction water must be tested to make sure it is not hazardous waste.

**If you have questions or comments about anything you read about in this newsletter, please call Plant Manager Glenn Preisler at 268-3395.**

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